

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF WITHDRAWAL OF CERTAIN CLAIMS SUBJECT TO OMNIBUS
OBJECTIONS OF THE COMMONWEALTH OF PUERTO RICO, THE PUERTO RICO
HIGHWAYS AND TRANSPORTATION AUTHORITY AND THE EMPLOYEES
RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO**

To The Honorable United States District Judge Laura Taylor Swain:

1. On May 13, 2022 and September 16, 2022, the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and, together with the Commonwealth and HTA, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

representative of the Debtors pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² filed various omnibus objections.

2. In light of additional information received since such filings, the Debtors respectfully withdraw, without prejudice, their respective objections to the following proofs of claim (collectively, the “Withdrawn Claims”):

- *Four Hundred Sixty-Sixth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Deficient ADR Claims* [ECF No. 20797], **solely** with respect to Claim No. 77585;
- *Four Hundred Eighty-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Cross-Debtor Duplicate Claims* [ECF No. 21737], **solely** with respect to Claim No. 83024;
- *Five Hundred First Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21758], **solely** with respect to Claim Nos. 64882 and 87400;
- *Five Hundred Second Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21759], **solely** with respect to Claim No. 163463-1;
- *Five Hundred Fourth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21760], **solely** with respect to Claim Nos. 140704 and 120153;
- *Five Hundred Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21761], **solely** with respect to Claim Nos. 5607 and 18113-1;
- *Five Hundred Sixth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21762], **solely** with respect to Claim Nos. 85099, 112809, and 136023;
- *Five Hundred Seventh Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21763], **solely** with respect to Claim Nos. 178864, 138606, and 120124;
- *Five Hundred Eighth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21764], **solely** with respect to Claim Nos. 136571, 59034-1, 16395, 152951 and 139436;

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

- *Five Hundred Ninth Omnibus Objection (Substantive) of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Unresponsive ACR Claims* [ECF No. 21765], **solely** with respect to Claim No. 167347; and
- *Five Hundred Twenty-Eighth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico and the Puerto Rico Highways and Transportation Authority to Deficient ADR Claims* [ECF No. 22260], **solely** with respect to Claim Nos. 11316, 9663, and 11316.

3. The Debtors reserve all rights with respect to the Withdrawn Claims, individually and collectively, including to object to the Withdrawn Claims on any grounds whatsoever.

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Dated: October 28, 2022
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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